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USBY, W.S.

RANCH, D.B ARNIVAL, G.J. AVIS, J.G.

RRERA, D.W.

RAY, R.E. EIS, J.A. OVER, W.S. DLAN, P.M. NNI, B.J. RMAN, L.K. ALY, T.J.

DAHL, T.

BIG, J.G.

TCHINS, N.M.

CKSON, D.T. LL, R.E.

ESTER, A.W.

KENNA, F.G. NTROSE, J.K.

RGAN, R.V.

TTER, G.L. ZUTO, V.M. ING, T.L.

NDLIN, N.B.

HWARTZ, J.K

LOCK, G.H.

WART, D.L.

DRHEIS, G.M.

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GER, S.G. SIN, P.M.

SON, J.M.

RX, G.E. DONALD, M.M.

EGZG ROCKY FLATS

EG&G ROCKY FLATS, INC.

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303)966-7000

June 20, 1995

95-RF-05251

Jessie M. Roberson Assistant Manager for **Environmental Restoration** DOE/RFFO

TRANSMITTAL OF THE OPERABLE UNIT 11 FINAL PROPOSED PLAN AND DRAFT MODIFICATION OF THE COLORADO HAZARDOUS WASTE PERMIT (DATED JUNE 26, 1995) - SGS-184-95

Action: Submit the Final Proposed Plan and Draft Modification of the Colorado Hazardous Waste Permit (dated June 26, 1995) to the regulatory agencies for approval

The purpose of this correspondence is to formally transmit the Operable Unit 11 Final Proposed Plan and Draft Modification of the Colorado Hazardous Waste Permit (dated June 26, 1995) (attached) to the Department of Energy/Rocky Flats Field Office for submittal to the regulatory agencies. Included with this transmittal is the response to agency comments on the Final Proposed Plan and Draft Modification of the Colorado Hazardous Waste Permit (dated June 13, 1995). These verbal comments were provided by the regulatory agencies during a meeting on June 15, 1995.

If you have any questions concerning this correspondence, please contact Dan Booco of my staff at extension 8549.

S. G. Stiger, Director

Environmental Restoration Program Division

DB:dql

Orig. and 1 cc - J. M. Roberson

Attachments:

As Stated

M. N. Silverman - DOE/RFFO

SSIFICATION

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Response to Regulatory Agency Verbal Comments on the OU 11 Final Proposed Plan and Draft Modification of the Colorado Hazardous Waste Permit (dated June 13, 1995)

The following comments were provided by the Colorado Department of Public Health and Environment (CDPHE) and the Environmental Protection Agency (EPA) during a meeting on June 15, 1995. Meeting attendees were Daniel Booco (EG&G Rocky Flats), Dave George (DOE), Rob Henneke (EPA), Eileen Jemison (EG&G Rocky Flats), Bonnie Lavelle (EPA) and Carl Spreng (CDPHE).

 First page, second paragraph: Add sentence stating that the CDPHE is the lead regulatory agency.

Comment incorporated.

 First page, third paragraph: Add sentence from "Site Background" section which states that the OU 11 and IHSS 168 boundaries coincide. Replace any subsequent references to IHSS 168 with OU 11.

Comment incorporated.

3. First page, fourth paragraph: Change reference to Record of Decision to Corrective Action Decision/Record of Decision and make appropriate changes in glossary.

Comment incorporated.

4. First page, fifth paragraph, second sentence: Remove "a previous removal action or natural environmental processes mitigate" and add "are within acceptable ranges" to end of sentence.

Comment incorporated.

5. "Title Block" section: Change document date to June 26, 1995.

Comment incorporated.

6. "Information" section: Change EPA zip code to 80202-2466.

Comment incorporated.

"Site Background" section, first paragraph, second sentence: Add dash between "contractor" and "operated."

Comment incorporated.

8. "Site Background" section, second paragraph, third sentence and third paragraph, second sentence: Delete sentence.

Comment incorporated.

9. "Summary of Site Risks" section, first paragraph, second sentence: Change to three objectives and add "evaluating the risks to human health and the environment."

Comment incorporated.

10. "Summary of Site Risks" section, second paragraph, last sentence: Change sentence to "An Applicable or Relevant and Appropriate Requirements (ARARs) evaluation was not performed because no PCOCs were identified in groundwater, thus there are no applicable requirements for OU 11. In this case, the results of the CDPHE Conservative Screen were determined to be the best indication that no action was required for the site."

Comment incorporated.

- 11. "Summary of Remedial Alternative" section: Change to "Summary of Preferred Alternative." Comment incorporated.
- 12. "Glossary" section: ARARs definition change "which" to "that." CERCLA definition add "amended in 1986" and minor grammatical wording change. IAG definition add comma after date. Preferred Alternative definition delete "tradeoffs with "respect to." Proposed Plan definition change "through" to "with." ROD definition change to CAD/ROD definition. Risk definition change "and" to "and/or."

Comments incorporated.